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7 Counsel for Defendants Vegas Affordable Stone and Tile, Inc.,
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 TRUSTEES OF THE BRICKLAYERS &
11 ALLIED CRAFTWORKERS LOCAL 13
12 DEFINED CONTRIBUTION PENSION TRUST
FOR SOUTHERN NEVADA; TRUSTEES OF
13 THE BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 HEALTH
BENEFITS FUND; TRUSTEES OF THE
14 BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 VACATION
FUND; BRICKLAYERS & ALLIED
15 CRAFTWORKERS LOCAL 13 NEVADA;
TRUSTEES OF THE BRICKLAYERS &
16 TROWEL TRADES INTERNATIONAL
PENSION FUND; TRUSTEES OF THE
17 BRICKLAYERS & TROWEL TRADES
INTERNATIONAL HEALTH FUND; and
18 TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,
19

20 Plaintiffs,

21 vs.

22 COMMERCIAL UNION TILE & STONE, INC.,
a Nevada corporation; VEGAS AFFORDABLE
23 STONE AND TILE, INC., a Nevada corporation;
STONE CONSULTING, LLC, a Nevada limited
liability company; JONATHAN WILLIAM
24 CANJA, individually; and JEDEDIAH
MICHAEL FELLER, individually,
25

26 Defendants.

27 CASE NO.: 2:15-cv-02129-APG-NJK
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**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSES
TO PENDING MOTIONS FOR
SUMMARY JUDGMENT**

(SECOND REQUEST)

1 The parties to this action, by and through their undersigned counsel, stipulate and agree to
2 further extend the deadline to file responses to the following pending motions for summary
3 judgment from January 13, 2017 to February 13, 2017:

4 Defendant Jedediah Feller's Motion for Summary Judgment (dkt. # 53);

5 Plaintiffs' Motion for Summary Judgment (dkt. # 54);

6 Defendant Vegas Affordable Stone and Tile, Inc.'s Motion for Summary Judgment (dkt. #
7 55);

8 Defendant Stone Consulting, LLC's Motion for Summary Judgment (dkt. # 56);

9 This is the second request for an extension of time for these deadlines, and the request is
10 not made for the purpose of delay. The parties have been diligently discussing a resolution to this
11 matter and have made substantial progress in that regard. The parties submit that good cause
12 appears for the extension, and continue to wish to dedicate time and resources to a resolution
13 without incurring additional litigation expense. The parties expect this to be their last request for

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1 such an extension in this matter.

2 Dated this 11th day of January, 2017.

3 GARG GOLDEN LAW FIRM

4 By /s/ Anthony B. Golden

5 Anthony B. Golden, Esq.
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7 *Counsel for Vegas Affordable Stone and*
Tile, Inc., Stone Consulting, LLC, and
8 *Jedediah Michael Feller*

THE URBAN LAW FIRM

By /s/ Nathan R. Ring

Michael A. Urban, Esq.
Nathan R. Ring, Esq.
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(702) 968-8087
Counsel for Plaintiffs

9 AQUINO LAW GROUP, LTD.

10 By /s/ Aaron A. Aquino

11 Aaron A. Aquino, Esq.
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13 Las Vegas, Nevada 89146
(702) 871-6464
14 *Counsel for Commercial Union Tile &*
Stone, Inc. and Jon Canja

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16 **ORDER**

17 IT IS SO ORDERED:

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20 UNITED STATES DISCTRICT JUDGE

21 January 11, 2017
22 DATED: _____